

BLUME FORTE FRIED ZERRES & MOLINARI

By: HARRIS S. FELDMAN, ID# 010712003

One Main Street

Chatham, NJ 07928

973-635-5400

Attorney for Plaintiff, Maritza Rodriguez

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MARITZA RODRIGUEZ

Plaintiff(s),

vs.

WALMART, et al.

Defendant(s).

Civil Action

No. 2:16-cv-09338-MCA-SCM

NOTICE OF MOTION

TO: TO: Jyoti M. Halsband, Esq.
Cottrell Solensky, PA
550 Broad St. - Ste 1000
Newark, NJ 07102

COUNSEL:

PLEASE TAKE NOTICE that on the next available date for this matter to be heard, the undersigned, counsel for plaintiff Maritza Rodriguez, pursuant to Fed. R. Civ. P. 12(b)(2), will move before the Honorable Steven C. Mannion, Judge of the United States District Court, for the District of New Jersey, Newark, New Jersey, for an Order amending the complaint to substitute defendant "John Doe 1" with Willy Sarmiento and remanding the

above captioned matter back to State Court for lack of subject matter jurisdiction.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, plaintiff, Maritza Rodriguez, shall rely upon the Certification of plaintiff's counsel, Harris S. Feldman and Brief.

/s/Harris S. Feldman
Harris S. Feldman, Esq.
BLUME FORTE FRIED ZERRES & MOLINARI, P.C.

Dated: October 19, 2017